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## NATIONAL BASKETBALL ASSOCIATION

OLYMPIC TOWER . 646 FIFTH AVENUE . NEW YORK, N. Y. 10022 . 212-826-7000

OFFICE OF THE GENERAL COUNSEL

RECEIVED

May 6, 1993

MAY - 6 1993

Mr. Jonathan D. Levy Economist Office of Plans and Policy Federal Communications Commission 1919 M Street, N.W., Room 822 Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Inquiry Into Sports Programming Migration Re:

Dear Jonathan:

Phil Hochberg informed me yesterday that, in light of several inaccurate and misleading statements made by the Association of Independent Television Stations ("INTV") in its April 12, 1993 submission, you had a few questions concerning the television distribution of the Philadelphia 76ers, New York Knicks and Boston Celtics. I thought that I would take this opportunity to briefly respond to those misstatements before you leave for Australia.

Philadelphia 76ers: INTV's claim (at page 36) that "beginning with the 1994-95 season, all [76er] games will appear on PRISM" is nothing more than unfounded speculation. Currently, as indicated in the NBA's Comments (at page 16), the 76ers are party to a three-year contract with WPHL, a local over-the-air station in Philadelphia, that covers the 1991-92 through 1993-94 NBA seasons. There is absolutely no reason at this time to think that WPHL and the 76ers will not continue their broadcast relationship during the 1994-95 season (and in future seasons) or that some other Philadelphia broadcast station will not seek to acquire the right to televise 76ers games in the future if WPHL decides, for its own reasons, not to extend its 76er relationship.

New York Knicks: INTV's attempt to convey the impression that the Knicks have deliberately reduced the number ôf lôcal over-the-air broadcasts from "27 in the 1989-90 season" is not only contrary to fact (i.e., the Knicks were not carried at all on local broadcast television in 1989-90) but ignores the fact that, over the past five years, New York over-the-air stations have decided, for their own commercial and editorial reasons, to carry non-sports programming in lieu of Knicks games. Indeed, as described in the NBA's Comments

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(at page 14) and in the Comments of Madison Square Garden Corporation, dated March 29, 1993 (at pages 5-11), in light of the lack of interest in the Knicks demonstrated by New York broadcast stations, Knicks games would not be available at all to New York viewers in the absence of basic cable carriage of such games.

Boston Celtics: INTV's statements (at page 37) that the Celtics used to broadcast "between 44 and 46 away games from 1985 to 1989" and that "[t]oday, there are far fewer games on off-air television in Boston" is simply wrong. In fact, WLVI broadcast between 38 and 41 Celtics regular season and playoff games during the 1985-86 through 1988-89 seasons. The Celtics' current local broadcast station, WFXT, carried 41 regular season and playoff games during the 1992-93 season.\* Accordingly, INTV's claim that there were fewer Celtics games broadcast locally in Boston this season is nonsense.

\* \* \*

In addition to responding to INTV, I wanted to wish you a safe, enjoyable and stimulating sojourn to Australia. (Some people will do anything to escape the Washington summers!). I hope to hear about your trip when you return.

Sincerely, Bill

William S. Koenig Assistant General Counsel

WSK:sl Enclosures

"Upon review of the data that we supplied in connection with our Comments, I discovered that we had incorrectly stated the number of local regular season Celtics broadcasts for the 1992-93 season. Enclosed are corrected replacement pages for you to insert for the Celtics' summary page and 1992-93 regular season page originally sent to you. I have also enclosed a corrected summary of the broadcast and cable coverage of NBA regular season games which reflects the change made to the Celtics' summary. Please note that this league-wide summary clearly contradicts INTV's assertion (at page 36) that "we have begun to see a decline in the number of NBA games seen on local television stations" between the 1990-91 and 1992-93 seasons. As you can see, during the 1992-93 season, 736 NBA games appeared on local broadcast stations compared to 709 games during the 1990-91 season.

## BROADCAST AND CABLE COVERAGE OF NBA GAMES' (REGULAR SEASON)

Year	National Broadcast <sup>a</sup>	Local/Regional Broadcast	National Cable	Local/ Regional Cable	Total Telecasts
1980-81	14	Not available	40	Not available	Not available
1981-82	19	494	40	329	882
1982-83	7	465	80	570	1,122
1983-84	9	486	80	502	1,077
1984-85	11	461	55	629	. 1,156
1985-86	12	523	56	543	1,133
1986-87	15	563	55	520	1,153
1987-88	16	582	50	577	1,225
1988-89	16	710	56	634	1,415
1989-90	16	716	51	779	1,562
1990-91	22	709	51	914	1,696
1991-92	24	700	51	910	1,685
1992-93*	25	736	51	922	1,734

For the purposes of this chart, superstation games have only been accounted for as broadcasts in the local market of the team carried by that superstation.

Includes All-Star Game.

The numbers for the current 1992-93 season represent scheduled telecasts.

# SUMMARY (BY TRAM) OF ANNUAL REGULAR SEASON LOCAL/REGIONAL TELECASTS

TEAM:

BOSTON CELTICS

Year	Local/Regional Broadcast	Lecel/Regional Cable	Total
1982-83	41	25	66
1983-84	25	40	65
1984-85	30	40	70
1985-86	37	40	77
1986-87	37	38	75
1987-88	37	39	76
1988-89	37	39	76
1989-90	39	38	77
1990-91	40	34	74
1991-92	38	38	76
1992-93	39	46	85

#### TEAM: BOSTON CELTICS

YEAR: 1992-93

#### REGULAR SEASON

MBOIUM	HOME GAMES	AWAY GAMES	TOTAL GAMES	
LOCAL/REGIONAL BROADCAST (WFXT)	0	39	39	
NATIONAL BROADCAST (NBC)	5	1_	6	
LOCAL CABLE	NA	NA	NA	
REGIONAL CABLE (SP CH NE)	35	11	46	
NATIONAL GABLE (TNT)	2	7	9	
NATIONAL CABLE (superstation)¹ (WTBS)	1	0	1	
TOTAL NOT EXHIBITED IN BOSTON	1	1	2	
TOTAL NOT EXHIBITED ANYWHERE		2		

<sup>&</sup>lt;sup>1</sup> These games were authorized for local broadcast and were retransmitted for national cable distribution.